

**OTTERBOURG P.C.**

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*Counsel to SOF International, LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
GENESIS GLOBAL HOLDCO, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 23-10063 (SHL)
	:	
Debtor.	:	(Jointly Administered)
	:	
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**NOTICE OF DEPOSITION OF GEMINI TRUST  
COMPANY, LLC PURSUANT TO FED. R. CIV. P. 30(b)(6)**

**PLEASE TAKE NOTICE** that, pursuant to Rules 7026, 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, and Federal Rules of Civil Procedure 26 and 30(b)(6), SOF International, LLC (“SOF”), by and through their undersigned counsel Otterbourg P.C., will take the deposition upon oral examination of Gemini Trust Company, LLC (“Gemini”), on a date and time on or before **April 8, 2024 at 10:00 a.m. (Prevailing Eastern Time)**, or such other date to which SOF agrees, at the New York Office of Otterbourg P.C., 230 Park Avenue, 30<sup>th</sup> Floor, New York, New York 10169, or at such other time and location that the parties may choose by mutual agreement or as ordered by the Court. The deposition will continue from day to day thereafter until concluded or adjourned.

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific PTE. LTD. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

The deposition shall be under oath, shall be taken before a court reporter or other person authorized to administer oaths, and will be conducted in accordance with the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure. The deposition will be recorded by stenographic means.

Pursuant to Rule 30(b)(6), Gemini shall designate one or more officers, directors, managing agents, or other persons who consents to testify on its behalf as to each of the matters set forth in Schedule A. The person(s) Gemini designates must testify about information known or reasonably available to Gemini. SOF requests that Gemini provide written notice, at least five (5) business days in advance of the deposition of: (1) the name(s) of each designee who will be produced to testify on behalf of Gemini; (2) the job title of each such person; and (3) the topic(s) set forth in Schedule A upon which each such person will testify.

Dated: New York, New York  
March 26, 2024

**OTTERBOURG P.C.**

By: /s/ James V. Drew  
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**SCHEDULE A - TOPICS FOR EXAMINATION**

1. The Settlement Agreement attached as Exhibit B to the *Debtors' Motion for Entry of an Order Approving a Settlement Agreement Among the Debtors, Gemini Trust Company, LLC, the Ad Hoc Group of Genesis Lenders, and the Official Committee of Unsecured Creditors* [Dkt. No. 1499, Ex. B] (the "Gemini Settlement Agreement"), including any and all matters related thereto.

2. The Term Sheet (as defined in the Gemini Settlement Agreement), including any and all matters related thereto.

3. The Gemini Master Claim Stip (as defined in the Gemini Settlement Agreement), including any and all matters related thereto.